

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
)
Plaintiff,)
)
vs.) 4:05-CV-00329-TCK-SAJ
)
TYSON FOODS, INC., et al,)
)
Defendants.)

- - - - -
THE DEPOSITION OF MICHAEL
TRAYLOR, produced as a witness on behalf of the
Plaintiff in the above styled and numbered cause,
taken on the 27th day of November, 2007, in the City
of Fayetteville, County of Washington, State of
Arkansas, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

A P P E A R A N C E S

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FOR GEORGE'S:

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I N D E X

W I T N E S S

P A G E

MICHAEL TRAYLOR

Direct Examination by Mr. Garren	4
Cross Examination by Ms. Bronson	42
Cross Examination by Mr. Bond	44
Cross Examination by Mr. Thompson	48
Cross Examination by Mr. Mirkes	49
Redirect Examination by Mr. Garren	50

Signature Page	54
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Reporter's Certificate	55
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1 (Whereupon, the deposition began at
2 9:02 a.m.)

3 MICHAEL TRAYLOR

4 having first been duly sworn to testify the truth,
5 the whole truth and nothing but the truth, testified
6 as follows:

7 DIRECT EXAMINATION

8 BY MR. GARREN:

9 Q Please tell the court your full name.

10 A Charles Michael Traylor. 09:02AM

11 Q Where do you currently reside?

12 A Two and a half miles west of Prairie Grove.

13 Q Is there an address there?

14 A 16670 Stonewall Road.

15 Q Okay. Is that also where you conduct your 09:02AM
16 business as Traylor Spreading Service?

17 A Yes, sir.

18 Q Okay. You've given a deposition in the past I
19 understand?

20 A Yes. 09:03AM

21 Q Just some little helpful hints in going
22 through it this morning that may facilitate how we
23 get this thing done, and that is, if you let me
24 finish my question and I'll let you finish your
25 answer before each of us speaks, that way the court 09:03AM

1 reporter can take down the information. I'll ask
2 you to verbalize your responses with a yes or no or
3 some other verbalization, not shaking or nodding of
4 your head, please. If at any time you feel the need
5 to take a break, let me know and we'll complete that 09:03AM
6 set of questions and let you take a break.

7 A Okay.

8 Q If you have any questions about my question,
9 if you don't understand it, ask me to rephrase it or
10 tell me you don't so we make sure we understand each 09:03AM
11 other and the question and your responses.

12 A Okay.

13 Q You are here today under a subpoena; is that
14 correct?

15 A Yes, sir. 09:03AM

16 Q Let me hand you what has been marked as
17 Exhibit No. 1 and ask you if that's the exhibit that
18 you received.

19 A Yes.

20 Q And the exhibit has -- I'm sorry. The 09:04AM
21 subpoena has an exhibit attached to it on the third
22 page. Did you review the list of documents that
23 were requested for your production to us?

24 A Yes, I did.

25 Q And did you produce everything that you had in 09:04AM

1 your possession that would be set forth on this list
2 of items?

3 A Yes.

4 Q Exhibit No. 2 is there in front of you. Is
5 that the set of documents that you provided pursuant 09:04AM
6 to this subpoena?

7 A Yes.

8 Q And do you retain documents in what is called
9 electronic form on a computer?

10 A No, sir. 09:04AM

11 Q All your records are kept by hand on paper?

12 A Yes.

13 Q Did you talk to anybody in preparation for
14 your deposition today?

15 A No. 09:04AM

16 Q Did you review any documents in preparation
17 for this deposition today?

18 A Well, we dug all this stuff out and copied it.

19 Q So you kind of looked at it when you did that?

20 A Yes. 09:05AM

21 Q Did you sit down and read it or --

22 A I haven't read it.

23 Q The documents that we have in Exhibit 2 in
24 front of us, are these documents that you normally
25 keep in the operation of your business known as 09:05AM

1 Traylor Spreading?

2 A For Oklahoma it is, yes.

3 Q Do you have other documents that you keep for
4 Arkansas?

5 A We haven't started that yet. 09:05AM

6 Q So you don't have to make a report with regard
7 to your applications in Arkansas; is that correct?

8 A No. As far as I know, they haven't started
9 anything yet.

10 Q But you yourself, regardless of what they 09:05AM
11 require, you don't keep records of --

12 A I have a farm plan for my farm, yes.

13 Q Other than your farm, if you spread poultry
14 waste on any other locations in Arkansas, do you
15 keep records of where that occurs? 09:06AM

16 A I haven't started yet, no.

17 Q Briefly tell the court what is your education
18 starting with high school.

19 A Twelve years of education in high school.

20 That's it. 09:06AM

21 Q What high school was that?

22 A Prairie Grove High.

23 Q Did you kind of grow up in Prairie Grove then?

24 A Yes, sir.

25 Q Tell the court what you consider to be your 09:06AM

1 present occupation at this time.

2 A Well, we're in the trucking business
3 basically. We haul rice hull and shavings and
4 perform a cleaning service to clean chicken houses.

5 Q So in addition to spreading the poultry waste 09:06AM
6 that you take out, you also clean out the house in
7 order to then spread it?

8 A We clean it out and we also bed it back. We
9 sell fresh bedding back for the houses.

10 Q Have you ever been a poultry grower in the 09:06AM
11 past?

12 A No, sir.

13 Q Have you ever worked for a poultry integrator
14 company in the past?

15 A No. Just cleaning for them. 09:07AM

16 Q Okay. I meant --

17 A Not actually working for the company, no.

18 Q A direct working for the company, you've not
19 been an employee or contracted with an integrator?

20 A No. 09:07AM

21 Q Look at Exhibit 2 of your documents and go to
22 Page 10. There's Bates numbers at the bottom and
23 this is an annual report cover sheet, which then
24 contains behind it application records for Oklahoma.

25 Who prepares these reports? 09:07AM

1 A Well, my secretary or my wife and myself and
2 the guys that work for me or work with me.

3 Q So there will be several people who fill out
4 these reports?

5 A We all sit down and do it together. 09:07AM

6 Q Okay. When you do that, do you do it
7 contemporaneously when the work is being performed;
8 as you see a date here as an application, do you
9 make that entry at that date or do you keep some
10 other record and then transfer it to these forms? 09:08AM

11 A We usually transfer it from another piece of
12 paper that we kept up with.

13 Q What is that piece of paper; what does it look
14 like?

15 A Just a little old book about yea big I carry 09:08AM
16 in my pocket.

17 Q What happens to that book; do you still retain
18 those books?

19 A Yes.

20 Q Do you still have them today? 09:08AM

21 A Yes.

22 Q How far back do you have them?

23 A I've got them back from the beginning.

24 Q Really?

25 A Basically. 09:08AM

1 Q You started spreading in when?

2 A March of '77.

3 Q And you still have all those books for that
4 period?

5 A I think I've got most of them.

09:08AM

6 Q Okay.

7 A He looked at them.

8 Q I'm sorry?

9 A I said he's looked at them.

10 Q Good. Well, you're pointing to Paul Thompson?

09:08AM

11 A Yes. He knows how good of records I keep.

12 Q Good. At some point I'd like to make

13 arrangements then to get copies of those books and

14 we'll arrange to have a copy service or somebody do

15 that and then return the originals to you. It might

09:09AM

16 actually be done in Prairie Grove, I don't know, but

17 I'd like to make that arrangement. I think those

18 books are probably similarly defined as records that

19 you should produce under this subpoena, but we're

20 happy to undertake the copy expense and make those

09:09AM

21 available, if you would do so. Do you have any

22 problem doing it?

23 A No.

24 Q So when I look at these application reports

25 that show the Oklahoma records, I might be looking

09:09AM

1 at your handwriting, your wife's handwriting, your
2 secretary's handwriting?

3 A It won't be mine. But I was there.

4 Q So it would be one of the others?

5 A It would be my wife or my secretary, one. 09:09AM

6 Q And they use your book that you normally carry
7 around to --

8 A I translate it for them.

9 Q Okay. So you tell them what to put on the
10 form? 09:10AM

11 A Right.

12 Q All right. The books that you told me about
13 that you keep and have kept for years, do they
14 record where applications occurred in Arkansas also?

15 A I've got more Arkansas than I do Oklahoma. 09:10AM

16 Q All right. When you clean out a barn and then
17 go and spread the waste, the owner of the land on
18 which the application occurs, do they provide you a
19 waste management plan that they have for their farm?

20 A Yes. We have to have soil tests done before 09:10AM
21 we can spread it.

22 Q Okay. Let me make sure I understand. I
23 understand about the soil test. That's a report
24 that shows the nitrogen, phosphorus levels in the
25 soil; correct? 09:11AM

1 A Yes.

2 Q Are you familiar with a waste management plan
3 like you have for your farm; do you receive a
4 similar copy from the farm that you spread on?

5 A All we get is the soil test. 09:11AM

6 Q Do you also receive a waste analysis of the
7 waste that came out of the barn?

8 A Yes.

9 Q And you use that in conjunction with soil
10 tests where you apply it; is that correct? 09:11AM

11 A Yes.

12 Q To your knowledge when you take the poultry
13 waste out of the barn, it contains basically the
14 feces, the urine and the bedding material, does it
15 not? 09:11AM

16 A Yes, sir.

17 Q Are there occasions where there will be
18 chicken bodies decomposed or portions of them?

19 A There's always dead chickens in it because you
20 can't see them all. 09:12AM

21 Q When those -- do they get spread on the land
22 also when you are spreading?

23 A Yes.

24 Q When that material is removed from the barn,
25 is any part of it used by the grower for growing 09:12AM

1 poultry thereafter?

2 A I don't understand what you mean.

3 Q Well, when you take the poultry litter and the

4 waste that's contained in the litter out of the

5 barn, does the grower for the poultry use any of

09:12AM

6 that for growing their poultry after you removed it?

7 A No. As far as I know, they don't.

8 Q When you started your business in '76 of

9 spreading, did you have your rice hull or bedding

10 material business also at that time?

09:13AM

11 A I had had it and had a partner in it and I

12 sold out to the partner and I got in the cleaning

13 side of it, and then my partner that I sold to went

14 broke, and about a year or so later I got back into

15 the bedding business.

09:13AM

16 Q When did this time frame of getting out and

17 getting back into the bedding business occur?

18 A We quit in March of -- somewhere around March

19 of '77 is when I quit the shaving business the first

20 time, and it was probably like '77 or '8 before I

09:13AM

21 got back in, and I could look and see.

22 Q But for about a year in there you've been in

23 both the clean-out business and the bedding supply?

24 A Started out in the shaving business. Had a

25 partner and we had a disagreement, so he bought me

09:13AM

1 out. So I got in the clean-out side, and he went
2 broke in a year or two, so I got back in.

3 Q Tell me over the years what kind of material
4 in the bedding side of your business have you
5 normally used. 09:14AM

6 A We use a lot of rice hulls, lot of pine
7 shavings and pine sawdust.

8 Q The rice hulls, where would you normally find
9 or purchase those?

10 A A lot of them come out of Stuttgart, Arkansas. 09:14AM

11 Q And the pine shavings and/or pine dust did you
12 say?

13 A Come out of Russellville or Waldron area,
14 Arkansas.

15 Q Is that generally still true today? 09:14AM

16 A Yes.

17 Q Your source for those materials?

18 A We are going a little bit further for hulls.
19 We are going into Mississippi now for hulls.

20 Q Why is that? 09:14AM

21 A Because there's a shortage of hulls in
22 Arkansas so we're having to go further to get them.

23 Q So is that one of the reasons that there's
24 been a raise in price for that bedding material?

25 A Yeah, whenever you pull up to the pumps. 09:14AM

1 Q Your cost of transportation?

2 A Yes.

3 Q Your fuel cost. Tell me generally when has a
4 grower seen a price rise start to occur to them in
5 the recent past; do you know?

09:15AM

6 A Probably about two years ago is when it really
7 started going up in price.

8 Q As a result of that, did you notice some of
9 your customers not replacing the bedding as often as
10 they might have in the past?

09:15AM

11 A Yes.

12 Q Tell me about that. How often in the past
13 would they normally replace the bedding that goes
14 into the barn?

15 A Most everybody used to clean once a year and
16 then they got to where -- I mean I cleaned some
17 houses that hadn't been cleaned in five or six
18 years, you know, but basically they're back to a
19 one-year deal now or year and a half, most of them.

09:15AM

20 Q When you say cleaned houses that hadn't been
21 cleaned for five or six years, would those be
22 broiler houses?

09:15AM

23 A Yes, and turkey grow-out.

24 Q And has that been in the recent past or are
25 you just talking about generally?

09:15AM

1 A Oh, we haven't had any that's been that long
2 in the last two years or probably three.

3 Q Sometime before that you got into that?

4 A Yes.

5 Q Was that the exception?

09:16AM

6 A Yes.

7 Q When you acquire -- let me back up and talk
8 about when you go clean out a barn, you're paid for
9 the clean-out service that you performed; is that
10 correct?

09:16AM

11 A Yes.

12 Q Do you buy the poultry waste or how do you
13 acquire it?

14 A Well, most of the time a lot of this stuff
15 right here we hauled it for farmers in Oklahoma.
16 They bought it and then they just hired me to haul
17 it.

09:16AM

18 Q I see. So are there times when you would buy
19 the poultry waste yourself and act as a broker and
20 resell it?

09:16AM

21 A Yes, uh-huh.

22 Q When you did that, would you normally mark up
23 the price of the poultry waste?

24 A We charge a cleaning fee. Usually we charge
25 them the price of the litter and a cleaning fee.

09:17AM

1 That's all it amounts to.

2 Q So the price you paid for it, is the price you
3 sold it to them without markup?

4 A Right.

5 Q You would make your money on the cleaning fee 09:17AM
6 charged?

7 A Yes.

8 Q In addition to the cleaning fee, is there a
9 spreading fee that's separate?

10 A No. It's all the same to clean it and spread 09:17AM
11 it.

12 Q Today what do you generally charge to clean a
13 barn?

14 A We charge -- we do it by the load. It's \$75 a
15 load. 09:17AM

16 Q And a load on a clean-out generally relates to
17 how many tons?

18 A Around ten ton.

19 Q How large is a spreading truck that you use
20 for -- 09:17AM

21 A It's a twin screw three-axle truck. It has a
22 20-foot bed on it.

23 Q And does it hold the full ten tons?

24 A Yes.

25 Q That truck is slightly larger than I've 09:17AM

1 normally seen. Is that a fair statement, it's a
2 larger truck?

3 A Yes. It's a tandem, three-axle truck.

4 Q Most spreader trucks are not that large, are
5 they? 09:18AM

6 A Well, you hardly ever see a single axle litter
7 truck anymore. Most everybody has went to twin
8 screws because of the cost of operating, but we've
9 got -- all of our shaving trucks are single axle --
10 they're two-axle trucks, but the litter trucks 09:18AM
11 basically everybody has gone to twin screws,
12 three-axle trucks.

13 Q What time frame did that start occurring?

14 A Oh, shoot. I was trying to think when I
15 bought my first one. It was about probably '83, 09:18AM
16 '84, somewhere along in there.

17 Q And you said because of the cost of operating.
18 Is it cheaper to operate one at ten tons than a four
19 to six-ton truck?

20 A You can haul twice as much on that truck as 09:18AM
21 you can on a small truck and you lose one driver.
22 You can haul twice the material with one truck.

23 Q I see. Is the gas mileage in this truck
24 better also or is it about the same as the small
25 truck? 09:19AM

1 A Be about the same but you are getting twice as
2 much done so you are gaining.

3 Q Right.

4 A On that clean-out, we also had a mileage fee.

5 Anything over a mile, we charge mileage. 09:19AM

6 Q And that's a loaded mile; correct?

7 A Yes, sir.

8 Q So anything over the first mile?

9 A Uh-huh.

10 Q What is it? 09:19AM

11 A Most of this is \$2 a mile.

12 Q Is that different today?

13 A We're up to \$3 a mile now.

14 Q And that's generally reflecting the higher
15 cost of fuel? 09:19AM

16 A Yeah. We probably raised that to 75 like two
17 years ago. Used to be around 70.

18 Q How do you -- who determines where you're
19 going to go to spread waste when you've done a
20 clean-out; how does that occur? 09:20AM

21 A People we're working for.

22 Q So people call you that want it and then you
23 make arrangements to get it spread on their land; is
24 that right?

25 A Yes. 09:20AM

1 Q You said earlier some will go ahead and buy
2 the waste directly themselves and you just simply
3 haul and spread; correct?

4 A Yes.

5 Q Are there occasions where they call you that 09:20AM
6 you have to go find a source of waste to then spread
7 on their land, too?

8 A Yes, occasionally.

9 Q Is that usually when you act as a broker in
10 buying the waste? 09:20AM

11 A Yes.

12 Q Is whose of your -- do you advertise your
13 business or is it word of mouth?

14 A Mostly word of mouth. Our shaving business we
15 advertise, but the clean-out we haven't been. 09:21AM

16 Q In the clean-out side still, how many
17 competitors do you think you have in that business
18 at this time?

19 A Everybody has a truck.

20 Q Everybody has a spreader truck or just a 09:21AM
21 truck?

22 A Spreader truck.

23 Q So there's a lot?

24 A There's a lot of them.

25 Q Including those with the dual axle or triple 09:21AM

1 axle that you talked about?

2 A Most everybody has gone to the three-axle
3 trucks. There's very few single axle litter trucks
4 left in the country. There's a few farmers that do
5 their own but that's about it.

09:21AM

6 Q And they're generally taking out of their own
7 barn and spreading it on their own land?

8 A Or they're buying it from their neighbor and
9 hauling it to their own farm or whatever.

10 Q Does the larger truck that you're talking
11 about with the ten loads or ten tons per load, does
12 that allow you to go farther in distance, too, or is
13 it basically more economical?

09:21AM

14 A You can go further cheaper. I mean you can
15 haul it further easier, faster.

09:22AM

16 Q Before you got into these larger trucks, what
17 would be the average distance between your source of
18 material to the site, application site for
19 spreading?

20 A Oh, I'd say an average of five to ten miles
21 normally.

09:22AM

22 Q Today is that different with the spreading
23 trucks that you use?

24 A No. Basically -- well, you might haul a
25 little further now. On the twin screws you might go

09:22AM

1 fifteen miles. We try to sell it as close as we can
2 due to the time frame and cost, cost factor.

3 Q On a typical broiler house I'm going to say
4 typically it's 400 by 40. I know there's some
5 larger now and some smaller, but based on that, how
6 many loads do you normally pull out of that kind of
7 a broiler house?

09:22AM

8 A On a year's run it will probably be between
9 somewhere to 100 to 120 ton to the house. It will
10 vary depending on how hard they caked it.

09:23AM

11 Q Do you pick up and spread cake material that
12 might have been stored for a period of time?

13 A Yes.

14 Q And is that in addition to or part of a
15 clean-out when you do a clean-out?

09:23AM

16 A It will be in a stacking shed usually on a
17 farm and we just go in the stacking shed and get it.

18 Q Is that included in your price for clean-out
19 or do you charge another amount for --

20 A No. We charge the same to clean the stacking
21 shed as we do for the chicken house.

09:23AM

22 Q Okay. Is your business in the clean-out and
23 spreading limited to dry poultry waste?

24 A Yeah, pretty much. I don't mess with the wet.

25 Q You don't have the equipment to do the liquid

09:23AM

1 spreading?

2 A No. I even quit cleaning the hen houses, what
3 they call the dry hen houses. Haven't done that in
4 a long time.

5 Q Why is that?

09:24AM

6 A It's always wet and nasty, and I don't want to
7 mess with it. It takes you a week to clean your
8 truck up and your loader. I just like the dry
9 stuff, and it's easier to handle and easier on your
10 equipment.

09:24AM

11 Q Let's talk a little bit about you're in the
12 long haul business, too, are you not?

13 A Yes.

14 Q Before I go there, how many spreading trucks
15 do you usually run and operate in your business?

09:24AM

16 A Oh, we've got -- I own two and I have a
17 partner that has one.

18 Q So you have a total of three trucks with a
19 partner?

20 A Uh-huh.

09:24AM

21 Q In the long haul business, describe the
22 equipment that you use to do long haul.

23 A We've got semi-trucks and we have walking
24 floors or belt trailers. I have two what they call
25 belt trailers, V bottom, and the rest of them are

09:24AM

1 walking floors.

2 Q Total trucks is how many?

3 A Six that we're hauling litter on.

4 Q Explain to me again a belt trailer.

5 A It's built like a spreader truck and it cleans 09:25AM

6 itself out. I mean you don't have to worry -- the

7 walking floor, we have to use draped tarps. We hang

8 a tarp in front and it will clean the trailer out;

9 otherwise, you have to sweep it out, but a V bottom

10 cleans itself out. 09:25AM

11 Q It does that how?

12 A By running the belt or the chain.

13 Q So the belt at the bottom of the V allows it

14 to move to the back of the truck where it dumps?

15 A Yes. 09:25AM

16 Q Do these trucks actually lift and dump?

17 A No. They're all --

18 Q You have to push out?

19 A Goes out the back.

20 Q How long have you been in the long haul 09:25AM

21 business?

22 A Oh, probably five years.

23 Q What made you move to the long haul business?

24 A Everybody is wanting the litter out of here

25 and there's a demand for it so we started moving it. 09:25AM

1 They started out giving it to us to get it out of
2 here.

3 Q And where did that first occur, what area?

4 A In the Eucha watershed. Up around Gentry and
5 Decatur is where we got most of it given to us.

09:26AM

6 Q When you would long haul it, which area or
7 direction would you go?

8 A Went to Oklahoma. A lot of it went north into
9 Missouri and Kansas.

10 Q Did you participate then in the Eucha-Spavinaw
11 long haul program that was subsidized?

09:26AM

12 A No.

13 Q Have you participated in any subsidy programs
14 for long hauling?

15 A No.

09:26AM

16 Q When you do your long haul -- let's talk about
17 economics. How large is the semi in capacity; what
18 do you carry?

19 A Haul about 23 tons.

20 Q Is that for each of the six types of trucks?

09:26AM

21 A Yes.

22 Q And generally speaking, how far do you want to
23 take it to be economical for you and make a profit?

24 A We'll take it as far as they want to go as
25 long as they got the money.

09:27AM

1 Q So they're paying you a loaded mile; is that
2 correct?

3 A Yeah.

4 Q How much is your loaded mile that you charge?

5 A Right now we're charging 3.30 a loaded mile. 09:27AM

6 Q And there's no charge for the empty load
7 coming back?

8 A No.

9 Q Do you try and do double hauling and refill
10 with some other type of commodity when you come 09:27AM
11 back?

12 A If it's handy, but we don't do much of it
13 because it's too time consuming. We're always under
14 a time frame to get the houses cleaned and you'll
15 lose a load messing with the back hauling. 09:27AM

16 Q So you are pretty much solely into the hauling
17 of the waste on the long haul?

18 A Yeah.

19 Q Give me some average distances that you see
20 you're now traveling in the long haul business. 09:27AM

21 A We're probably averaging 150 miles right now.

22 Q Who is paying you the fee to deliver the
23 poultry waste at this point?

24 A Farmers on the other end.

25 Q So if I'm a typical farmer and I'm on average 09:28AM

1 150 miles away from where you get the poultry waste,
2 when you show up at my farm, how much do I have to
3 pay you?

4 A The litter, we're having to pay right now from
5 5 to \$6 a ton for the litter and then we charge 5
6 bucks to load it. So there's a 10 or \$11 fee for
7 the litter, plus the trucking.

09:28AM

8 Q And the trucking is the 3.30 a mile?

9 A Yes, sir.

10 Q When you deliver it, do you typically dump it
11 and they do the spreading?

09:28AM

12 A Yes.

13 Q The little books that you keep records on, do
14 you have the same kind of records with regard to
15 your long haul?

09:29AM

16 A Yes.

17 Q So you can make those available for copying,
18 too; is that correct?

19 A Yes.

20 Q Thank you. Do you apply poultry waste to any
21 of your own land?

09:29AM

22 A Yes.

23 Q How long have you done that?

24 A Since 1977.

25 Q How much land do you have?

09:29AM

1 A Right now we're farming about 1,100 acres.

2 Q And when you say farming, what do you raise?

3 A We're raising hay and cattle. We're not
4 really farmers. We raise hay and cattle.

5 Q How many head do you normally run? 09:29AM

6 A We are running about 400 mother cows right
7 now.

8 Q You stay busy, don't you?

9 A I really don't have time for this crap.

10 Q I understand. We'll try to speed it up here. 09:29AM

11 I know you have commercial applicator licenses in
12 Oklahoma; correct?

13 A Yes.

14 Q Do you have any licensing requirements in
15 Arkansas for the work you do? 09:29AM

16 A We started -- last year we took the test and I
17 have my Arkansas license but I don't have them with
18 me.

19 Q And that was the first year you had to do
20 that? 09:30AM

21 A Yes.

22 Q Is it an annual requirement to have the
23 license?

24 A You know, I really don't know. We took that
25 test. We had a deal up there and we went to it and 09:30AM

1 took the test, and they haven't really started
2 policing as far as I know.

3 Q You got a certificate in the mail or
4 something, though?

5 A They give us one that night as best I 09:30AM
6 remember.

7 Q Describe what the test was about. What did
8 you do?

9 A Just questions on how to spread, how to set
10 your spreader and basically what to do, how to do 09:30AM
11 it.

12 Q You've already been doing it over 20 years.
13 Let me ask this question: How did you first learn
14 to do it?

15 A Trial and error. 09:30AM

16 Q Nobody taught you then?

17 A Not really. I went to work for the guy that
18 was in the business and he showed me a few things.

19 Q Do you regularly calibrate your spreading
20 trucks that you use today? 09:30AM

21 A Well, we know how to set them.

22 Q And describe how that happens; how do you know
23 what to set?

24 A You can raise your tailgate to a certain
25 height and you are running certain gears to put out 09:31AM

1 what they want out, two ton, one ton, three ton
2 whatever. You change your ground speed to change
3 your tonnage.

4 Q At any time have you actually calibrated the
5 amount of waste being spread by driving over a large 09:31AM
6 tarp and determining the quantity?

7 A Yes.

8 Q When did you first do that?

9 A Oh, gosh, they done a study out there, the
10 county agent did, and they went with me and stayed 09:31AM
11 with me for a week and they calibrated everything
12 that I done for a week.

13 Q What state are we talking about?

14 A In Arkansas, and I've been to school in
15 Oklahoma. I mean they showed us in school how to do 09:31AM
16 that, but we already knew, but we've been to the
17 class.

18 Q So you learned it in a class in Oklahoma?

19 A And also in Arkansas.

20 Q And Arkansas recently? 09:31AM

21 A No. It was back in -- man, I can't remember.
22 It's been ten years ago I guess.

23 Q Oh, okay. I misunderstood what you said. You
24 just took a test recently?

25 A Yes. 09:32AM

1 Q To show that you really do know what you are
2 doing; right?

3 A I guess I do. I seem to be, right.

4 Q The county extension person you described
5 going around with you is one in Arkansas; is that 09:32AM
6 right?

7 A Yes.

8 Q Did he lay a tarp down and calibrate for you
9 also?

10 A Yes. Then when we got home, we figured the 09:32AM
11 tonnage and acres I covered, and we was right within
12 a ton of what we should have been within the whole
13 deal.

14 Q So there is some leeway there?

15 A I mean you can't get it perfect. 09:32AM

16 Q But generally the lifting of the tailgate and
17 the speed in which you drive --

18 A Yes.

19 Q -- determines the amount of waste you are
20 applying? 09:32AM

21 A And the width you run, how close you run to
22 the last tracks.

23 Q I see.

24 A All of it --

25 Q Having to do with overlap is what you are 09:33AM

1 talking about there?

2 A Yes.

3 Q Is there a particular time of the year that
4 you find yourself spreading more than others?

5 A Everybody likes it in the spring, but we do it 09:33AM
6 year round.

7 Q Emphasis then would be in the spring time?

8 A More than likely, and you do some fall
9 spreading. Some people put out wheat and stuff and
10 they like it in the fall, too, but basically it's 09:33AM
11 year round.

12 Q All right. Does -- are you familiar with the
13 boundaries, the general boundary lines of the
14 Illinois River watershed?

15 A What do you mean? 09:33AM

16 Q Do you know where the boundary lines of the
17 Illinois River watershed exist?

18 A Yes.

19 Q Okay. How do you know that?

20 A Grew up here. 09:34AM

21 Q So you know when you are in the watershed of
22 the Illinois as opposed to Eucha or Spavinaw?

23 A Uh-huh, plus we have maps that show all that
24 stuff.

25 Q You need that in your business because of the 09:34AM

1 nutrient limited watersheds have certain limitations
2 on spreading; is that correct?

3 A Yes.

4 MR. BOND: Object to the form.

5 Q I want you to try and give me -- I have a copy 09:34AM
6 of a map here if it makes it easier that I haven't
7 marked but if you feel the need to show. You live
8 or office out of Prairie Grove. What is the radius
9 that you normally work your business of spreading,
10 not the long haul, just the spreading? 09:34AM

11 A Oh, we used to go to Tahlequah, a lot,
12 Oklahoma, and that area, back to the state line, and
13 then we worked as far east as Hindsville and as far
14 north we've done some spreading in the edge of
15 Oklahoma -- I mean the edge of Missouri. I'm sorry. 09:35AM

16 Q When you did that, you would take your
17 spreader truck up, load it and then spread it within
18 a five or six or ten-mile area at that time?

19 A Yes, sir.

20 Q Then your spreader truck would go back home 09:35AM
21 empty?

22 A Yes. We would usually park our trucks where
23 we was working and drive our pickup back and forth
24 usually.

25 Q To save on the mileage? 09:35AM

1 A Yes.

2 Q Your actual cost is trying to get it within
3 that five or ten-mile radius of the source; is that
4 correct?

5 A Yes. 09:35AM

6 Q Based on your Exhibit No. 2, I see that a
7 large portion of the source of poultry waste were
8 various Tyson complexes for a period of time?

9 A Yes, sir.

10 Q How did you come to do work for Tyson's 09:35AM
11 complexes?

12 A Paul Vaughn called me to work for him. He had
13 six of the complexes tied up at that time.

14 Q Paul Vaughn?

15 A Yes, sir. 09:36AM

16 Q And when you say tied up, what does that mean?

17 A He had them ever since they started. Ever
18 since they built the houses, he took the litter out
19 of them for years, and he did up until they sold
20 them. 09:36AM

21 Q And so he was already doing that work with
22 Tyson?

23 A He was taking the litter from them, yes.
24 There were other people done it before I did.

25 Q With him or separate of him? 09:36AM

1 A Yes, with him.

2 Q And how did you know Paul Vaughn?

3 A He run the sale barn in Siloam, livestock
4 auction.

5 Q All right, and is it because he was too busy 09:36AM
6 that you needed to help him?

7 A He didn't have the equipment. He didn't have
8 time to do it. He hired it all done all the time.
9 He never did have a truck.

10 Q I see. So -- 09:36AM

11 A He just got the litter and he hired somebody
12 to spread it.

13 Q So he would buy the litter from Tyson?

14 A Yes.

15 Q And then pay somebody to go spread it 09:37AM
16 someplace?

17 A Yes.

18 Q Would he arrange for where it was to be
19 spread?

20 A Yes. He would tell us every time where he 09:37AM
21 wanted it.

22 Q So when you worked with Paul Vaughn in doing
23 the Tyson complexes, he would just pay you your
24 clean-out fee and mileage?

25 A Yes, sir. 09:37AM

1 Q And did Paul Vaughn buy the poultry waste from
2 Tyson then?

3 A As far as I know, he did.

4 Q The end user where you would deliver it and
5 spread it would pay Paul Vaughn?

09:37AM

6 A No. He owned the land.

7 Q Oh, it was on his own land?

8 A Yeah. I never hauled for anybody but him.
9 Everything I hauled for Paul went on his land.

10 Q I see. How many total acres does he have or
11 did he have?

09:37AM

12 A Gosh, he had 2,000 or better probably. I know
13 he had a lot of land.

14 Q In your records we see his name frequently.
15 That explains you were simply doing it for him?

09:38AM

16 A Yeah. We hauled the cake every bunch and done
17 the clean-out for him. I couldn't even tell you how
18 many farms he's got because he had land at that
19 time.

20 Q Where were the areas that you normally then go
21 apply? I guess we would see them in your
22 application reports?

09:38AM

23 A It's all right there.

24 Q Generally how far were you driving for Paul
25 Vaughn?

09:38AM

1 A The furthest point for Paul was probably maybe
2 eight miles.

3 Q Okay.

4 A He had all his farms located around those
5 complexes, so it would -- you know, it was 09:38AM
6 convenient.

7 Q Was he a cattle raiser?

8 A Yes.

9 Q And, therefore, he would raise hay also?

10 A Yes. At one time I think him and Danny Smith 09:38AM
11 got all the litter out of those houses. As far as I
12 know, somebody told me that, but I never did work
13 for Danny Smith, but that was his partner in the
14 sale barn.

15 Q In the sale barn. Where does Danny live? 09:39AM

16 A He lives right around Westville or somewhere.
17 I don't even know.

18 Q Okay. Do you ever have to go out and find
19 locations to spread or is that generally arranged in
20 advance of you having to go pick it up and spread 09:39AM
21 it?

22 A Most of the time we have a place before we get
23 it.

24 Q Other than your work with Paul Vaughn in
25 cleaning out the Tyson complexes, were there other 09:39AM

1 sources in Oklahoma that you relied on to work?

2 A They're right there.

3 Q So everything would be in --

4 A Everything we're supposed to keep is right
5 there.

09:39AM

6 Q And would those other locations be poultry
7 growers for other integrators?

8 A There's some Willow Brook farms in there and
9 turkey farms that we cleaned around Tahlequah, and I
10 worked for John Simmons. He had Complex 3 I believe
11 it was. It should tell you.

09:40AM

12 Q Is he a Simmons grower?

13 A No.

14 Q Who did he grow for?

15 A He didn't grow for anybody. He got the litter
16 from Tyson. He had Complex 3 I believe it was. I
17 can look it up and tell you.

09:40AM

18 Q That's all right. It's in the records?

19 A It's in the records. Everything is right
20 here.

09:40AM

21 Q Let me ask then so I understand. Were there
22 sources other than Tyson complex poultry waste?

23 A Yes, sir, Willow Brook turkey farms, and that
24 was over in the Tahlequah area.

25 Q And that's all the other sources in Oklahoma

09:40AM

1 that you remember at this point?

2 A Everything I done is right there. I can't
3 remember but it's right there.

4 Q Prior to these records, though, you were
5 hauling and spreading waste in Oklahoma, were you
6 not?

09:40AM

7 A No, sir. Right there when they started --
8 well, I did spread some a long time ago in the
9 Tahlequah area, some turkey litter, but I only had
10 one or two farms I done over there, and when I
11 started working for Paul Vaughn hauling out of the
12 Tyson complexes, that's when all this stuff started
13 and we had to start keeping records.

09:41AM

14 Q I see. So you didn't really work in Oklahoma
15 until the Paul Vaughn deal?

09:41AM

16 A Basically.

17 Q So basically all your work is Arkansas?

18 A Arkansas.

19 Q I see.

20 A To be frank, I was too high for them.

09:41AM

21 Q In Oklahoma?

22 A Yes.

23 Q Your prices you mean?

24 A Yes, sir, or they said it was.

25 Q Did you have a similar arrangement for hauling

09:41AM

1 poultry waste in Arkansas for Tyson as opposed to
2 Oklahoma?

3 MR. BOND: Object to the form.

4 A I worked for individuals. I never did work
5 for the Tyson Company.

09:41AM

6 Q I don't mean to say you worked for them, but
7 you had a major source of poultry waste coming out
8 of basically a single Tyson set of complexes. Did
9 you have another large integrator supply of poultry
10 waste in Arkansas?

09:42AM

11 MR. BOND: Object to the form.

12 A George's.

13 Q George's was a major supplier?

14 A Some of them, yes. Not George company farms
15 but George growers.

09:42AM

16 Q I understand we're trying to distinguish that.

17 A Right.

18 Q Any other poultry integrator company growers
19 besides George's that you would consider to be an
20 ongoing or regular set of business?

09:42AM

21 A We done some Simmons houses and some Peterson
22 houses later on, but not until all this started
23 moving out of the country when we started working in
24 the Eucha watershed.

25 Q So the Peterson was more in the Eucha?

09:42AM

1 A Yes.

2 Q Is there any time that at the end of the day
3 you might have excess poultry waste for a particular
4 site that you can't spread?

5 A No. Never had enough most of the time. It's 09:43AM
6 a good commodity. These Arkansas rocks, it makes
7 the grass grow and Oklahoma rocks.

8 Q What kind of miles per gallon do you typically
9 get in your spreader truck?

10 A Around five to six miles a gallon. 09:43AM

11 Q Typically how many miles per gallon do you get
12 in a long haul truck?

13 A Four to five.

14 Q When you go to a spread site, how do you know
15 where you are supposed to spread the poultry waste? 09:44AM

16 A Farmer tells me.

17 Q All right. Other than that, that's the only
18 way you know?

19 A Uh-huh.

20 Q That's a yes? 09:44AM

21 A Yes. I'm sorry.

22 Q Are you personally aware of any improper
23 poultry waste disposal yourself at any time?

24 A What do you mean by that?

25 Q Waste being put where it shouldn't be, waste 09:44AM

1 being put on more than it should be?

2 A No. They wrote the rules and we try to stay
3 with them to the best of our knowledge. They
4 changed the rules. If you look in there, through
5 the years they've changed them as we went. Usually
6 a different set of rules every year for a while.

09:45AM

7 Q Are you familiar with an association called
8 Poultry Partners?

9 A Not really. I don't associate with too many
10 people.

09:45AM

11 MR. GARREN: I'll pass the witness.

12 CROSS EXAMINATION

13 BY MS. BRONSON:

14 Q Mr. Traylor, my name is Vicki Bronson and I
15 represent Simmons Foods and I just have a couple of
16 questions for you. Do you know anybody that works
17 for Simmons?

09:45AM

18 A Yes.

19 Q Who do you know?

20 A I know several fieldmen because we haul
21 shavings.

09:46AM

22 Q Whenever you are hauling litter, does anybody
23 from Simmons ever call you and place an order with
24 you for litter, not a Simmons grower but a Simmons
25 employee?

09:46AM

1 A No.

2 Q Does a Simmons employee ever ask you where you
3 are going to spread litter?

4 MR. GARREN: Leading, objection.

5 A I've only cleaned one of the company farms 09:46AM
6 lately and I just got done with it last week. It
7 was the first company farm I cleaned for Simmons.

8 Q Which one was that one?

9 A Farm 30.

10 Q Okay, and that's a farm that's actually 09:46AM
11 managed by Simmons?

12 A Yes.

13 Q Okay.

14 A It's a company farm in Southwest City. We
15 only done four of the houses. There's ten there. 09:46AM
16 There's two other people on the farm also.

17 Q That's Southwest City, Missouri?

18 A Yes, ma'am.

19 Q Where did that litter go?

20 A We hauled it to Kansas. 09:47AM

21 Q Do you know what city in Kansas?

22 A Parsons, Kansas.

23 Q Did you say you cleaned four of the houses?

24 A Yes, ma'am. One through four I believe it
25 was. 09:47AM

1 Q Other than that farm, has anybody that
2 actually works for Simmons ever directed you where
3 to spread litter?

4 A No, ma'am. Not to my knowledge. I don't
5 remember it anyway. We've been cleaning some of the 09:47AM
6 farms that they've sold but the Laotians own them
7 now. We took the litter out of those the last few
8 years.

9 Q When you clean those houses, the -- do you do
10 that under the direction of the actual poultry 09:48AM
11 grower?

12 A No. We just buy the litter from them and we
13 haul it wherever we need it. Some of it goes on my
14 farm and some of it goes out of the country.

15 Q Okay. When you haul litter from those farms, 09:48AM
16 is any Simmons employee involved in that?

17 A No, ma'am.

18 MS. BRONSON: That's all I have.

19 CROSS EXAMINATION

20 BY MR. BOND: 09:48AM

21 Q Mr. Traylor, my name is Michael Bond and I
22 represent the Tyson entities that have been sued in
23 this matter. I just have a couple questions for
24 you. With regard to those Tyson complexes over by
25 Westville, when Tyson owned those, the litter in 09:48AM

1 those houses was being purchased, if I understand
2 your testimony correctly, by Paul Vaughn and I think
3 there was another name?

4 A Yeah. John Simmons had one of the complexes.

5 Q Okay, and just so I have this clear, Paul 09:48AM
6 Vaughn contracted with you --

7 A Yes, sir.

8 Q -- on hauling or cleaning that litter out,
9 hauling it and putting it where Paul it wanted to
10 go; correct? 09:49AM

11 A Yes, sir.

12 Q Was it the same with the other gentleman?

13 A Yes, sir.

14 Q And to the best of your knowledge Mr. Vaughn
15 purchased that litter from us? 09:49AM

16 A Yes.

17 Q Did any representative of Tyson Foods ever
18 tell you where to put that poultry litter?

19 A No, sir.

20 Q Okay. I know throughout this deposition 09:49AM
21 different terminology has been used with respect to
22 poultry litter. Do you consider poultry litter to
23 be a waste?

24 MR. GARREN: Objection, form.

25 A Can I answer it or what? 09:49AM

1 MS. BRONSON: Yeah, you can.

2 Q Yes.

3 A It's a waste material but it's a fertilizer.

4 I mean it's good.

5 Q Why do you think it's good? 09:49AM

6 A You can look around northwest Arkansas and see
7 what it's done for the country. If we didn't have
8 chickens in northwest Arkansas, we wouldn't have
9 nothing.

10 Q Do you know why Paul Vaughn used litter? 09:50AM

11 A To grow grass.

12 Q Why did he need grass?

13 A To feed his cattle.

14 Q Okay. So it was his business?

15 A Yes. 09:50AM

16 Q Okay. Those houses over by Westville were
17 sold?

18 A Yes, sir.

19 Q You understand that?

20 A Yes, sir. 09:50AM

21 Q Do you know who owns them now?

22 A Yeah. Let's see. They call it Green Country.

23 Q If I said Steve Butler, would that ring a
24 bell?

25 A Yeah, it would ring a bell. 09:50AM

1 Q Do you haul for Mr. Butler?

2 A No, sir.

3 Q Do you know if Mr. Vaughn still gets litter
4 from Mr. Butler?

5 A I don't think so to my knowledge. I haven't 09:50AM
6 worked for him for three years. Ever since Steve
7 bought them, I haven't been over there hardly.

8 Q Has Paul Vaughn contacted you to try to get
9 some litter or has he -- let me rephrase that.

10 Strike that. Has he contacted you and told you that 09:50AM
11 he has found some litter and he'd like you to pick
12 it up and spread it on his land?

13 A No, sir.

14 Q So this part of the business doesn't exist
15 today? 09:51AM

16 A It's gone.

17 Q Okay. When I look through these records that
18 you produced that Mr. Garren marked as Exhibit 2, it
19 appears to me, and I'd like you to look at them as
20 well, that litter spreading occurs in every month of 09:51AM
21 the year?

22 A Yes, sir.

23 Q Is that normal or does that just happen to
24 happen those years?

25 A No. It's pretty normal. 09:51AM

1 Q Okay.

2 A There's cake pulled out of them, out of
3 certain houses every day that has to be spread or
4 something done with.

5 Q People spread it -- well, strike that. I 09:51AM
6 might be done.

7 MR. BOND: That's all I have. Thank you.

8 CROSS EXAMINATION

9 BY MR. THOMPSON:

10 Q Mr. Traylor, as you'll probably recall, my 09:52AM
11 name is Paul Thompson and I represent George's in
12 this action and the other one that we've had the
13 pleasure of sitting down and chatting before on.

14 When Mr. Garren was asking you questions, you said
15 that you had hauled litter from some George's 09:52AM
16 contract farmers' operations?

17 A Yes, sir.

18 Q Have you hauled any litter from George's
19 company-owned or company-managed farms?

20 A It's probably been three years since I have. 09:52AM

21 Q Do you recall what farm that was?

22 A I obtained some out by Elm Springs. I cleaned
23 some complexes out in Siloam.

24 Q That's the commercial -- you talking about
25 what we call the commercial egg operation? 09:52AM

1 A No. It's the broiler farm. I think it's off
2 of Bill Young Road.

3 Q That sounds right but I'll take your word for
4 it. Other than when you cleaned out George's
5 company-managed farms, has anyone who was an 09:53AM
6 employee of George's ever contacted you and
7 instructed you or requested that you -- strike that
8 -- instructed you about how or where to apply
9 litter that you removed from a contract grower's
10 farm? 09:53AM

11 A No.

12 Q How would it impact your business if you were
13 told that you could not spread litter in the
14 Illinois River watershed?

15 MR. GARREN: Objection, form. 09:53AM

16 A I'm through. If they take the litter out of
17 northwest Arkansas and the Illinois River watershed,
18 northwest Arkansas is done for the farming industry,
19 cattle industry.

20 MR. THOMPSON: No further questions. 09:54AM

21 CROSS EXAMINATION

22 BY MR. MIRKES:

23 Q Mr. Traylor, my name is Craig Mirkes. We met
24 earlier. I'm with Peterson Farms. Earlier in your
25 testimony you made mention of they, they keep 09:54AM

1 changing the rules. Who is they?

2 A The Oklahoma Department of Agriculture.

3 Q And you're subject to their rules because you
4 have a license, a spreader's license?

5 A Yes. 09:54AM

6 Q And I have a list here so you are going to
7 have to bear with me. I don't want to cover any
8 ground that's already been covered. Do you have to
9 obtain training, continuing training for that
10 license? 09:54AM

11 A Yes, sir.

12 Q Who puts on that training?

13 A Oklahoma Department of Agriculture.

14 Q Pardon me. I'll try to save a little time. I
15 don't know if I'm saving time. I believe that is 09:54AM
16 all. Everything else was covered. Thank you, sir.

17 REDIRECT EXAMINATION

18 BY MR. GARREN:

19 Q Mr. Traylor, a couple of follow-up questions.
20 The training that you had to do in Oklahoma didn't 09:55AM
21 occur until when?

22 A I don't know when it started. I'll have to
23 look it up.

24 Q It would be in your records that you produced
25 today? 09:55AM

1 A Yes.

2 Q And so that would be within the last two or
3 three years, isn't it?

4 A No. We started in -- let's see. I think '02
5 was my first year for the license I believe.

09:55AM

6 Q Okay. So that's when you first received
7 training for Oklahoma and before that, you had not
8 been trained in Oklahoma; correct?

9 A No, sir.

10 Q When had you been trained in Oklahoma before
11 that?

09:56AM

12 A I hadn't been.

13 Q Okay. I misunderstood your response to my
14 question. How long -- speaking now about the
15 George's, how long had you been doing the company
16 farm for George's in Elm Springs or Siloam?

09:56AM

17 MR. THOMPSON: Object to the form.

18 Q When I say doing it, cleaning out and
19 spreading from their locations.

20 A I only done it for a couple of years. They
21 bought their own trucks.

09:56AM

22 Q All right. You said that when they bought
23 their own trucks, they started cleaning out and
24 hauling their own poultry waste; correct?

25 A Yes, sir.

09:56AM

1 Q You said in response to a question that cake
2 has to be spread every day. Why is that?

3 MR. BOND: Object to the form.

4 A To get rid of it.

5 Q Is that because there's no storage? 09:56AM

6 A No. It's in storage. I mean people spread
7 it -- maybe I need to rephrase what I said. It
8 happens every day. It don't have to be done every
9 day but it happens every day.

10 Q Do you have certain customers that require you 09:57AM
11 to go and time it because they have no storage and
12 the cake is pulled out and you just take it directly
13 from the barn?

14 A Most everybody has a stacking shed now and we
15 can get it out. We have a four or five-week period, 09:57AM
16 time frame to get it out unless they run out of room
17 but there's usually enough room in storage for
18 usually two cakings.

19 MR. GARREN: I have no other questions.

20 You have the right to read and -- receive a copy of 09:57AM

21 this, read it and sign it, which you must do so
22 within 30 days of receipt of it. It also allows you
23 to make corrections that you believe should be made
24 based upon what was taken down and what you thought
25 was supposed to have been said. You also have the 09:57AM

1 right to waive that reading and signature, but you
2 are required to say which one of those you wish to
3 do on the Record. So you need to tell me whether
4 you want to read and sign it or whether you want to
5 waive your signature.

09:58AM

6 THE WITNESS: I can read it and sign it I
7 guess.

8 MR. GARREN: We'll make sure that you make
9 arrangements with the court reporter, that she knows
10 how to get it to you and you back to her.

09:58AM

11 (Whereupon, the deposition was
12 concluded at 9:58 a.m.)
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SIGNATURE PAGE

I, Michael Traylor, do hereby certify
that the foregoing deposition was presented to me by
Lisa A. Steinmeyer as a true and correct transcript
of the proceedings in the above styled and numbered
cause, and I now sign the same as true and correct.

WITNESS my hand this _____ day of
_____, 2007.

MICHAEL TRAYLOR

SUBSCRIBED AND SWORN TO before me this
_____ day of _____, 2007.

Notary Public

My Commission Expires:

CORRECTIONS TO THE DEPOSITION OF
MICHAEL TRAYLOR

PAGE AND LINE NUMBER

CORRECTION

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